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July 11, 1994

Mr. Karl E. Bremer, Chief
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

RE: PEAR - Endangered Species
Detrex Corporation
12886 Eaton Avenue
MID 091 605 972
SME Project No. PE-21229

RECEIVED
JUL 15 1994

OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

US EPA RECORDS CENTER REGION 5



Dear Mr. Bremer:

This letter was written in response to the U.S. EPA's request for information concerning possible endangered species on the above referenced site. On June 2, 1994, Soil and Materials, Engineers, Inc. (SME) requested information from the United States Department of Interior. SME has received the requested information in a letter dated, June 14, 1994.

Based on information available to date, there are no listed or proposed species occurring within the area of the subject project. I have included a copy of the United States Department of the Interior letter as an enclosure.

If you have any questions or comments on this submittal, you may contact us at (313) 454-9900.


Very truly yours,

SOIL AND MATERIALS ENGINEERS, INC.

Robert J. Nowakowski, CPG
Project Consultant

Enclosure: Letter from U.S. Dept. of Interior
cc: Rhonda Blayer, MDNR
Bill Moore, Detrex Corporation
Ron Swan, Detrex Corporation

Detroit
Bay City
Kalamazoo
Lansing
Toledo


Consultants in the geosciences, materials, and the environment



IN REPLY REFER TO

United States Department of the Interior

FISH AND WILDLIFE SERVICE

East Lansing Field Office (ES)
1405 South Harrison Road, Room 302
East Lansing, Michigan 48823

TAKE
PRIDE IN
AMERICA

June 14, 1994

Robert J. Nowakowski
Soil and Materials Engineers, Inc.
43980 Plymouth Oaks Blvd.
Plymouth, MI 48170-2584

Re: Dextrex Corp. Facility Investigation, Detroit, Michigan

Dear Mr. Nowakowski:

This letter is in response to your request of June 2, 1994 for information on listed and proposed endangered and threatened species and critical habitat which may be present within the area of the proposed project site. Your request and this response are made pursuant to Section 7(c) of the Endangered Species Act of 1973 (the Act), as amended.

Based on information presently available to the Fish and Wildlife Service, there are no listed or proposed species occurring within the area of the subject project. This presently precludes the need for further action on this project as required under Section 7 of the Act.

The Service advises, however, that should a species become officially listed or proposed before completion of this project, the Federal action agency for the work would be required to reevaluate its responsibilities under the Act. Further, should new information become available that indicates listed or proposed species may be present and/or affected, consultation should be initiated with the Service.

Since threatened and endangered species data is continually updated, new information pertaining to this project may become available which may modify these recommendations. Therefore, the Fish and Wildlife Service recommends your agency annually request updates to this list.

We appreciate your concern for endangered species and look forward to continued coordination with your agency. Any questions can be directed to Tom Eitnearer of this office at (517) 337-6650.

Sincerely,

Charles M. Wooley
Field Supervisor

cc: Michigan Department of Natural Resources, Wildlife Division, Lansing, MI
(Attn: Tom Weise)

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JUN 16 1994

SME Plymouth

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

DATE: January 26, 1994

SUBJECT: Comments on Detrex Corporation's PEAR

FROM: William A. Enriquez *Wm Ez*

TO: Shari Kolak

I have reviewed the Preliminary Ecological Assessment Report (PEAR) for Detrex Corporation's Eaton Avenue Facility in Detroit, Michigan, and the following are my comments.

Under Section 2.0, DESCRIPTION OF THE BIOTA IN SURFACE WATER BODIES ON, ADJACENT TO, OR AFFECTED BY, THE FACILITY: This section is acceptable. It is clear the setting is an industrial park area.

Under Section 3.0, DESCRIPTION OF THE ECOLOGY OVERLYING AND ADJACENT TO THE FACILITY the plants identified (in common name) should also include their scientific name. Detrex Corp. shall correct that page.

Under Section 4.0, DESCRIPTION OF ANY ENDANGERED OR THREATENED SPECIES NEAR THE FACILITY: This section is unacceptable, they need to contact their local US Fish and Wildlife Office and get a written response as to the occurrence of any endangered species in their area.

Under Section 5.0, IDENTIFICATION OF FACILITY-SPECIFIC CONDITIONS PERTINENT TO THE EVALUATION OF FATE AND TRANSPORT PROCESSES OCCURRING AT THE SITE. SUCH AS AMOUNT OF SOIL EROSION: This section is unacceptable. It should identify the area of contaminated fill, the amount of contamination, and the potential fate and transport of these contaminants (i.e. is the contamination contained by clay soils?)

Under Section 6.0, IDENTIFICATION OF POTENTIAL AND PROBABLE EXPOSURE POINTS FOR ECOLOGICAL RECEPTORS: This section does identify the gravel area on the eastern portion of the site. However it does not mention that this area supports the pioneer-type plant species described in section 3.0. It does not mention the probable fate and transport of spill contaminants if it contacts the area. It does not identify the potential exposure to fugitive volatile organic emissions. Detrex Corp. shall include these components in the next revision.

Under Section 7.0, IDENTIFICATION OF ANY KNOWN OR OBSERVED EFFECTS OF FACILITY CONTAMINANTS TO BIOTA, SUCH AS FISH KILLS OR OTHER OBVIOUS IMPACTS: This section is unacceptable. The facts that no animal species were identified, and only pioneer-type plant species were identified, indicate that a large impact to the biota has occurred. This section shall identify the cause of this disturbance.

Under Section 8.0, AN INITIAL TOXICITY ASSESSMENT OF FACILITY CONTAMINANTS. THE POTENTIAL FOR ADVERSE ECOLOGICAL EFFECTS FROM CONTAMINANT EXPOSURE

SHOULD BE ASSESSED: The first paragraph of page 04 is unclear, particularly the last sentence "In addition . . ." Is the main point of the paragraph about inhalation exposure or dermal exposure? Also, what are the normal practices with regard to personal protective equipment at this plant? What are the exposure levels at and adjacent to the facility? This may be an area that requires further study.

Under Section 9.0, AN EVALUATION OF THE NEED FOR MORE DATA AND FURTHER INVESTIGATIONS TO COMPLETE THE ECOLOGICAL ASSESSMENT. SOME FACILITIES MAY NOT REQUIRE ADDITIONAL INVESTIGATIONS SUCH AS THOSE WHERE EXPOSURE TO ECOLOGICAL RECEPTORS IS KNOWN TO BE MINIMAL. HOWEVER, WHEN THE INITIAL TOXICITY ASSESSMENT PROVIDES AMBIGUOUS OR UNCERTAIN CONCLUSIONS, ADDITIONAL FIELD DATA ARE NEEDED (TASK 2). This section will be reevaluated once the revisions above are completed.

If you have any questions please call me (6-1484) or stop by.

CC: K. Bremer, Chief RCRA Permitting Branch
G. Hamper, Chief Illinois Section